

Leonardo M. Aldridge  
Attorney at Law  
20 Vesey St. Suite 400  
New York, N.Y. 10007

June 2, 2025

**BY ECF**

The Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2014  
New York, New York 10007

Re: United States v. Hubei Amarvel Biotech, C., Ltd., et al., 23 Cr. 302 (PGG)

Dear Judge Gardephe,

Mr. Qingzhou Wang's sentence is currently scheduled for June 26, 2025, at 2:00 pm. The purpose of this letter-motion is to seek, with no objection from the government, an adjournment of the sentencing hearing until August. The reasons that Mr. Wang's defense believe warrant an adjournment are as follows.

On Saturday, May 30, and in anticipation of the upcoming sentencing date, undersigned counsel and co-counsel David Mou interviewed Mr. Wang at the MDC, along with interpreter Lily Lau, during approximately four hours. During that meeting, Mr. Wang relayed that, when he was just days old, he was sold for \$400 by his biological parents to his adoptive parents in a remote village in China. The defense was not aware that this was the genesis of Mr. Wang's life, and, for mitigation purposes and under Section 3553, we would like to further explore it.

Additionally, Mr. Wang's wife recently provided approximately 12 new letters of support – all handwritten and in Chinese – which Ms. Lau has graciously agreed to translate. Those translations, of course, would take some time, and they will probably inform the sentencing memorandum on behalf of Mr. Wang.

Both parties have conferred and are available during the week of August 18, with a preference from the defense for the sentence to be held on Thursday, August 21. The government attorneys who prosecuted this case are not available Friday, August 22.

For the reasons stated above, Mr. Wang's defense team, with no objection from the government, respectfully requests that Your Honor adjourn Mr. Wang's sentence for August. As always, thank you for your time and consideration in this matter.

Respectfully,

s/

Leo Aldridge and David Mou  
Attorneys for Qingzhou Wang

Cc AUSAs Kevin Sullivan and Alexander Li

**MEMO ENDORSED:**

The application is granted. Defendant Wang's sentencing is adjourned to August 21, 2025 at 3:00 p.m. Wang's sentencing submission is due by July 18, 2025. The Government's sentencing submission is due by July 25, 2025.

SO ORDERED.



---

Paul G. Gardephe  
United States District Judge

Date: June 5, 2025